

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit 14

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF SOUTH CAROLINA
3 COLUMBIA DIVISION
4

5 THE SOUTH CAROLINA STATE CONFERENCE OF
6 THE NAACP, et al.,

7 Plaintiffs,

CASE NO.

vs.

3:21-CV-03302-MBS-TJH-RMG

8
9 THOMAS C. ALEXANDER, et al.,
10 Defendants.

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12
13 VIDEO TELECONFERENCE

14 DEPOSITION OF: REPRESENTATIVE THOMAS HAUGER

15 DATE: June 28, 2022

16 TIME: 9:40 a.m.

17 LOCATION: Virtual - Zoom

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19 TAKEN BY: Counsel for the Plaintiffs

20 REPORTED BY: Roxanne Easterwood, RPR
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1 using the computer and drawing what I was told to
2 draw.

3 BY MR. CUSICK:

4 Q. That was consistent for both -- any
5 Congressional maps?

6 A. Yes.

7 Q. Who would you consider the primary
8 decision-makers on substance of the maps for
9 creation purposes?

10 A. The ad hoc committee. Now, I will say
11 that we did start off with the staff plan that
12 Patrick and I drew, because at first there was no
13 committee members coming in. So we did draw an
14 original plan just for a base for them to start
15 looking.

16 Q. Did anyone else, outside of
17 Mr. Dennis, have any involvement in that initial
18 first draft?

19 A. No.

20 Q. Do you have any sense who the primary
21 map drawers were on the Senate side?

22 MR. PARENTE: Object to the form.

23 THE WITNESS: Other than with the
24 staff plan, Will Roberts, I imagine, with the
25 staff plan, just because it was the staff plan.

1 make sure people are being represented as they
2 wish and as they need to be.

3 Q. Did you at all suggest to do a
4 district-by-district analysis at any point to the
5 ad hoc committee?

6 A. No.

7 Q. Were you aware of any request for
8 discussions to do so?

9 A. No.

10 Q. I think we have answered this before,
11 and maybe this -- the easier way is to ask it now.
12 Was there any, to your knowledge, RPV analysis at
13 all conducted for any map that you worked on
14 during the Congressional redistricting cycle?

15 A. To my knowledge, no.

16 Q. Were there any discussions about this
17 proposal about increasing, decreasing, or
18 maintaining the black voting age population in
19 certain districts?

20 A. To my knowledge, no.

21 Q. Any discussions about how districts
22 would perform for black-preferred candidates?

23 A. To my knowledge, no.

24 Q. How would you describe the role that
25 race played in the development of this initial

1 plan?

2 A. They looked at BVAPs. I mean, it
3 didn't seem -- the BVAPs were so -- I mean, they
4 did look to see the BVAPS.

5 Q. Who are you referring to when you say
6 "they"?

7 A. Oh, the ad hoc committee wanted to
8 know the demographics of each district.

9 Q. Was there ever a meeting in which the
10 ad hoc committee, you and others looked at the map
11 in the map room to have a discussion or assessment
12 of it?

13 A. I would navigate on the map while they
14 looked at it. I wasn't part of the discussion. I
15 just moved boundaries to show them where it was.
16 I would basically say I'd move it around and say,
17 "This is the demographics of this area. This is
18 the demographics of that area." That's it.

19 Q. So, I guess, how many meetings were
20 there when the ad hoc committee came in to review
21 that initial proposal?

22 A. I wouldn't say they were official
23 meetings. I mean, I think it was more Jay Jordan
24 came in to kind of look at things.

25 Q. Did any other members come into the

1 Exhibit 10.

2 (Exhibit 10, Email Correspondence, re:
3 Redistricting Site Update, Bates 0106691-92,
4 marked for identification.)

5 BY MR. CUSICK:

6 Q. This is just so you and I are on the
7 same page. Is this the base map that you were
8 referring to before?

9 A. The House staff plan, Alternative 1
10 was actually, I believe, based off of the Senate's
11 plan. And there were a couple of updates at that
12 ad hoc committee made to the Senate's plan, if I
13 remember this one right.

14 Q. What is your understanding that it was
15 based on a version of the Senate plan?

16 A. I believe we brought the Senate plan
17 in, and Representative Jordan asked us to make
18 some changes to the Senate plan and submit that as
19 a House staff plan.

20 Q. Can you walk me through the process
21 from start to finish for the creation of this
22 Congressional House plan, Alternative 1?

23 A. Basically, we were told by
24 Representative Jordan we were going to use the
25 basis for the Senate plan's district. He

1 instructed us on which changes to make. We made
2 those changes, updated them. And since we did --
3 since it was the Senate staff plan we had updated,
4 we just changed it to the House staff plan
5 alternative.

6 It was another -- it wasn't based on a
7 staff plan, but it actually came through us, too.
8 So at that point it could have been, and we just
9 could have used the word "amendment" just because
10 it was a -- now a House staff plan, but it was
11 based -- it was now -- House had ownership of it,
12 but -- even though it was still a staff plan from
13 the Senate.

14 Q. Was it substantially similar to the
15 Senate's staff plan?

16 A. I would have to look and compare. But
17 it was much closer to the Senate's plan than it
18 was the House plan, for sure.

19 Q. So Representative Jordan suggests
20 using this new basis as -- you know, this map as
21 the new basis. Was anyone else involved in that
22 decision?

23 A. To my knowledge, no. I mean, my
24 directions came from him.

25 Q. I guess, what was the process for

1 documents as he was --

2 A. I don't -- I don't recall.

3 Q. What was available on the screen, in
4 terms of demographic data, as you were working
5 with him on this map?

6 A. He would have just demographics I
7 mentioned earlier -- well, the area, the area
8 water, demographics by race and ethnicity for the
9 general population and voting age population and
10 for housing units.

11 Q. Were you aware of whether he sought
12 feedback from anyone else on the ad hoc committee
13 as he was making these changes or suggestions for
14 changes?

15 A. I am not aware.

16 Q. Was anyone in the room at any point or
17 that came in to provide any legal advice as the
18 changes were being made?

19 A. No. Emma and the Judiciary Committee
20 members were there. They really didn't provide
21 any advice. They were just present in the room.

22 Q. So in the room it was you,
23 Representative Jordan, Ms. Dean. Was Mr. Franklin
24 there?

25 A. I don't remember if Jimmy or Roland,

1 Q. Were there any discussions about
2 changes to the alternative staff plan?

3 A. Not with me.

4 Q. Do you know who with?

5 A. I don't know. I was just saying,
6 nobody discussed any changes with me.

7 Q. Here I will not have to go question by
8 question through the long analyses.

9 But did you become aware of any new
10 analyses or reports analyzing or assessing this
11 plan during this time period?

12 A. I did not.

13 Q. Did you attend the January 10th ad hoc
14 committee hearing?

15 A. No.

16 Q. Did you do anything in preparation to
17 provide materials in advance of that hearing?

18 A. Printed maps and demographic sheets.

19 Q. On the same day the House Judiciary
20 Committee held a hearing as well, did you attend
21 that hearing?

22 A. No.

23 Q. Were you asked to provide or produce
24 anything in advance of the Judiciary Committee's
25 hearing?